

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TALECRIS BIOTHERAPEUTICS, INC., and
BAYER HEALTHCARE LLC,

Plaintiffs,

v.

BAXTER INTERNATIONAL INC., and
BAXTER HEALTHCARE CORPORATION,

Defendants.

C.A. No. 05-349-GMS

Jury Trial Demanded

BAXTER HEALTHCARE CORPORATION,

Counterclaimant,

v.

TALECRIS BIOTHERAPEUTICS, INC., and
BAYER HEALTHCARE LLC,

Counterdefendants.

REDACTED VERSION DI 239

DECLARATION OF JACLYN M. MASON IN SUPPORT OF
PLAINTIFFS' BRIEF IN OPPOSITION TO THE MOTION FOR
SUMMARY JUDGMENT FILED BY BAXTER INTERNATIONAL INC.
AND BAXTER HEALTHCARE CORPORATION

I, Jaclyn M. Mason, declare:

1. I am an associate at the law firm of Connolly Bove Lodge & Hutz LLP in Wilmington, Delaware and one of the counsel of record for Plaintiffs/Counterdefendants Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC. I make this declaration based on my personal knowledge and the inspection of the documents attached hereto.

2. A true and correct copy of the patent-in-suit, U.S. Patent No. 6,686,191, is attached hereto as Exhibit 1.

3. A true and correct copy of the highly confidential deposition transcript from the February 14, 2007 deposition of Erwin F. Gelfand, M.D. is attached hereto as Exhibit 2.

4. True and correct copies of pages 181-187, 189-192, 198-199, 206, 210, and 212-214 of the highly confidential deposition transcript from the March 3, 2007 deposition of Jeffrey V. Ravetch, M.D., Ph.D. are attached hereto as Exhibit 3.

5. True and correct copies of pages 274-275, 328-329, 398-399, 413-414, 420, 422-423, and 429-431 of the highly confidential deposition transcript from the March 4, 2007 deposition of Jeffrey V. Ravetch, M.D., Ph.D. are attached hereto as Exhibit 4.

6. True and correct copies of pages 75, 84-93, 96-97, 99, 111, 115, and 118-119 of the highly confidential deposition transcript from the February 28, 2007 deposition of Thomas J. Kindt, Ph.D. are attached hereto as Exhibit 5.

7. True and correct copies of pages 179-180 and 187 of the highly confidential deposition transcript from the March 1, 2007 deposition of Thomas J. Kindt, Ph.D. are attached hereto as Exhibit 6.

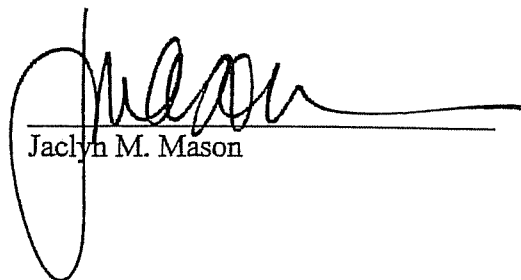
8. True and correct copies of pages 39-41 and 133-135 of the highly confidential deposition transcript from the February 22, 2007 deposition of Terrence Snape, Ph.D. are attached hereto as Exhibit 7.

9. True and correct copies of pages 186-188 and 192-196 of the highly confidential deposition transcript from the February 23, 2007 deposition of Terrence Snape, Ph.D. are attached hereto as Exhibit 8.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 29th day March, 2007 at Wilmington, Delaware.

Redacted Version
Filed: April 5, 2007



Jaclyn M. Mason